

Creighton A. Thurman, Esquire
Thurman Law Office
P.O. Box 897
Yankton, SD 57078
SBN No. 2897
Tel: 605-260-0623
Fax: 605-260-0624
thurmanlaw@iw.net

Attorney for the Defendant
Grant A. Sammelson, individually and
d/b/a Varsity Pub

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION**

JOE HAND PROMOTIONS, INC.,

Civil Action No. 12-4132

Plaintiff,

vs.

Answer

GRANT A. SAMMELSON, individually and
d/b/a VARSITY PUB,

Defendant.

COMES NOW the above-named Defendant, Grant A. Sammelson, by and through his attorney of record, Creighton A. Thurman, of Yankton, South Dakota, and for his Answer to the Complaint of the Plaintiff states and alleges as follows:

- 1.) The said Complaint fails to state sufficient grounds upon which relief can be granted.
- 2.) The Defendant denies each every matter, allegation, and thing contained therein, except that which is specifically or qualifiedly admitted.
- 3.) Upon information and belief, the Defendant admits paragraph 1 of said Complaint.
- 4.) The Defendant admits paragraph 2.

- 5.) As to paragraph 3 of said Complaint, Defendant believes personal jurisdiction exists in as much as the Defendant resides in the State of South Dakota.
- 6.) As to paragraph 4, the Defendant admits in as much as the Defendant and the Defendant's business is in the State of South Dakota.
- 7.) Further answering, this Defendant alleges that there is a good faith dispute existing between the Plaintiff and the Defendant as to what, if any, sums should be paid to the Plaintiff.
- 8.) Further answering, this Defendant alleges the Plaintiff is not entitled to any punitive damages as prayed for in his Complaint as there is no basis in fact or law for such a claim.

WHEREFORE the Defendant prays that the Complaint of the Plaintiff be dismissed with prejudice and on its merits and for such other and further relief that the Court may deem just and equitable under the premise.

Dated this 31st day of July, 2012.



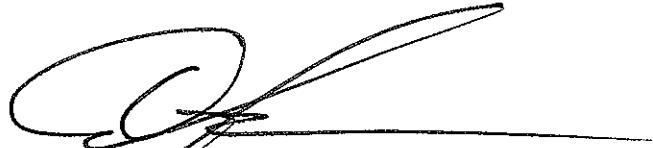
Creighton A. Thurman
Attorney for the Defendant

CERTIFICATE OF SERVICE

Creighton A. Thurman, attorney for the Defendant, hereby certifies that a true and correct copy of the foregoing Answer has been filed electronically with the court from ECF and that ECF will send an email notice of electronic filing to:

James R. Myers, Esquire
Myers Billion, LLP
300 N. Dakota Avenue, Suite 510
Sioux Falls, South Dakota, 57101.

Dated this 31st day of July, 2012.



Creighton A. Thurman
Attorney for the Defendant